

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

SECURITIES AND EXCHANGE )  
COMMISSION, )  
Plaintiff, )  
v. ) Case No. 3:24-cv-05711- ZNQ-RLS  
TRI-BRIDGE VENTURES, LLC ) JOINT STIPULATION TO  
And JOHN FRANCIS FORSYTHE, III, ) DISMISS,  
Defendants ) AND RELEASES  
 ) Motion Day: June 16, 2025  
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Plaintiff Securities and Exchange Commission (the “Commission” or the “SEC”) and Defendants John Francis Forsythe, III and Tri-Bridge Ventures LLC (“Tri-Bridge”) (collectively, the “Defendants”) respectfully submit this joint stipulation.

**WHEREAS**, the Commission filed its complaint in this civil enforcement action (the “Litigation”) on April 29, 2024.

**WHEREAS**, in the exercise of its discretion and as a policy matter, the Commission believes the dismissal of this case is appropriate.

**WHEREAS**, the Commission’s decision to seek dismissal of this Litigation does not necessarily reflect the Commission’s position on any other case.

**WHEREAS**, by this stipulation, the Commission and the Defendants agree to have this Litigation dismissed.

**NOW, THEREFORE,**

1. Pursuant to Fed.R.Civ.P. 41(a)(1)(A)(ii), the Commission and the Defendants stipulate that this Litigation be dismissed with prejudice as to the conduct alleged in the Complaint through the date of the filing of this Stipulation, and without costs or fees to either party.

2. Defendants, for themselves and any of their agents, attorneys, employees, or representatives, hereby waive and release:

- a. Any and all rights under the Equal Access to Justice Act, the Small Business Regulatory Enforcement Fairness Act of 1996, or any other provision of law to seek from the United States, or any agency, or any official of the United States acting in his or her official capacity, directly or indirectly, reimbursement of attorney's fees or other fees, expenses, or costs expended by Defendant[s] that in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.
- b. Any and all claims, demands, rights, and causes of action of every kind and nature, asserted or unasserted, against the Commission and its present and former officers or employees that arise from or in any way relate to the Litigation, including but not limited to investigative steps taken prior to commencing the Litigation.

3. Each of the undersigned represents that they have the authority to execute this stipulation on behalf of the party so indicated.

STIPULATED AND AGREED:

/s Pascale Guerrier

Pascale Guerrier  
Securities and Exchange Commission  
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COUNSEL FOR PLAINTIFF  
SECURITIES AND EXCHANGE  
COMMISSION

Dated: May 22, 2025

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COUNSEL FOR DEFENDANTS  
Dated: May 22, 2025

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COUNSEL FOR PLAINTIFF  
SECURITIES AND EXCHANGE  
COMMISSION

Dated: \_\_\_\_\_, 2025

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COUNSEL FOR DEFENDANTS

Dated: \_\_\_\_\_, 2025